

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
EVANSVILLE DIVISION**

DR. PAMELA BARNES)	
)	
Plaintiff,)	
)	
v.)	CAUSE NO.: 3:24-CV-00051-MPB-CSW
)	
OAKLAND CITY UNIVERSITY, INC.)	
)	
Defendant.)	

PLAINTIFF’S STATEMENT OF CLAIMS

Pursuant to the Court’s Order dated March 10, 2025 [Docket Entry 40], Plaintiff, Dr. Pamela Barnes, by counsel, respectfully submits her statement of claims and legal theories to be proven at trial:

1. This is an action brought by Plaintiff, Dr. Pamela Barnes against Defendant, Oakland City University, Inc. alleging violations of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §2000e. *et. seq.* and Defamation/Slander under Indiana law.

2. Specifically, Dr. Barnes contends she was discriminated against based on her gender – female, she was retaliated against when she complained of gender discrimination, and that she was been defamed/slandered via the Defendant’s stated and written reasons for her termination.

3. Dr. Barnes will present evidence that she was treated differently than her similarly-situated male counterparts, that she was retaliated for her complaints of said discrimination, and that the reasons outlined in her termination letter and verbally spread to her colleagues were knowingly false and malicious.

4. The Defendant's actions were willful, intentional, and done with reckless disregard for Dr. Barnes' rights as protected by Title VII and Indiana state law, and she has suffered damages as a result of the Defendant's unlawful actions.

Respectfully Submitted,

/s/Kyle F. Biesecker

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Counsel for Plaintiff, Dr. Pamela Barnes

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2025, a copy of the foregoing *Plaintiff's Statement of Claims* was filed electronically. Service will be made electronically on all ECF-registered counsel of record via email generated by the Court's ECF system.

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/s/Kyle F. Biesecker

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